



1 Plaintiff Cellspin Soft, Inc. respectfully submits this Unopposed Motion to Suspend All Deadlines in  
2 these matters Indefinitely.

3 The instant Motion is brought by Cellspin, and is unopposed by Defendants, in light of unique  
4 circumstances beyond the control of the parties. In short, certain of Plaintiff's experts, Dr. Garlick and Mr.  
5 Blok, are unavailable due to unforeseen conflicts, and the timeline for their renewed availability is uncertain  
6 at this time. The underlying details are set forth in the appended Declaration of M. Scott Fuller, which is  
7 attached as Exhibit A hereto. Due to privacy concerns, the appended Declaration will be submitted under seal.  
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9 In view of the circumstances, Plaintiff requests an Order Suspending all deadlines indefinitely, subject  
10 to the filing of a Status Report by Plaintiff within 30 days. It is Plaintiff's desire to provide the Court with an  
11 updated Agreed Proposed Amended Schedule at the time of the Status Report. Plaintiff agrees not to take  
12 the deposition of Defendants' experts after the current close of expert discovery, November 23, 2021.  
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16  
17 Respectfully submitted,

18  
19 Dated: November 12, 2021

GARTEISER HONEA

20 /s/ M. Scott Fuller

21 Randall T. Garteiser

22 CA State Bar No. 231821

23 Christopher A. Honea

24 CA State Bar No. 232473

25 M. Scott Fuller

26 TX State Bar No. 24036607

27 Attorneys for Plaintiff

28 Cellspin Soft, Inc.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via electronic mail on November 12, 2021 to all counsel of record.

/s/ M. Scott Fuller  
M. Scott Fuller

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that the content of the foregoing document was discussed with opposing counsel, and all opposing consent to the filing and are unopposed to the relief sought herein.

/s/ M. Scott Fuller  
M. Scott Fuller